

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
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AFFIDAVIT AND DISCLOSURE STATEMENT OF MARY ELIZABETH STOKES
ON BEHALF OF LEHMAN BROTHERS HOLDINGS INC.

CITY OF LONDON)
) ss:
COUNTRY OF THE UNITED KINGDOM)

MARY ELIZABETH STOKES, being duly sworn, upon his oath, deposes and
says:

1. I am a self-employed member of the Bar of England and Wales. I practise from the barristers' chambers known as Erskine Chambers, 33 Chancery Lane, London, WC2A 1EN.
2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have, through the London office of Weil, Gotshal & Manges, requested and I have consented to provide legal services by giving advice and appearing on behalf of certain of the Debtors in litigation in the Courts of England

and Wales. Such matters include the defence of claims brought by the holders of certain credit linked notes.

3. As part of my practice, I have been retained in the past and may be retained in the future by solicitors or attorneys who now represent persons that are parties in interest in the Debtors' chapter 11 cases. My clients in the past have also included, and in the future may include, persons who are parties in interest in the Debtors' chapter 11 cases.

4. I have no current engagements or instructions relating to the matters for which I have been retained in relation to the Debtors' chapter 11 cases or the worldwide Lehman Brothers group and I do not have any engagement or relationship with any person or represent any interest adverse to the Debtors or their estates.

5. I have not provided any pre-petition services to the Debtors and the Debtors do not owe me anything for any such services.

6. I have not agreed to share and will not share any portion of the compensation to be received by me for services rendered in relation to the Debtors' chapter 11 cases with any other person, other than by making my regular contribution to the expenses of running Erskine Chambers.

If I should discover any facts bearing on the matters described herein, I will supplement the information contained in this Affidavit.

By: Mary E. Stiles

Subscribed and sworn to before me
this 4 day of December, 2009

Geetha Sankar
Solicitor

OF BEACHCRAFT LLP, 100 PETER
LANE, CONDO 100, FCLIA 100

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RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN
BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively,
the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Jennifer Sapp
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as
appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address:

Mary Stokes

Erskine Chambers

33 Chancery Lane

London WC2A 1EN

2. Date of retention: 9 November 2009

3. Type of services provided (accounting, legal, etc.): Legal
4. Brief description of services to be provided:

Providing advice and representing the Debtors in litigation in the Courts of England and Wales. Such litigation includes the defence of claims brought by the holders of certain credit linked notes.

5. Arrangements for compensation (hourly, contingent, etc.)

Hourly rate and brief fees and daily fees for court appearances
 - (a) Average hourly rate (if applicable):

£400
 - (b) Estimated average monthly compensation based on prepetition retention (if employed prepetition):

N/A
6. Prepetition claims against the Debtors: None
7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee: None
8. Stock of the Debtors currently held: None
9. Stock of the Debtors currently held individually by any member, associate, or professional employee: None

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named person is to be employed.

None

11. Name of individual completing this form:

Mary Elizabeth Stokes
